

**RESPONSE TO COMMENTS**  
**DRAFT NPDES PERMIT # ID-002442-2**  
**The Meadows L.L.C.**  
**Wastewater Treatment Plant**  
**Ketchum, Idaho**

A draft National Pollutant Discharge Elimination System (NPDES) permit for the Meadows, L.L.C. Wastewater Treatment Plant (WWTP) in Ketchum, Idaho was issued for public notice on August 9, 1999. The Public Notice initiated a 30-day public comment period. EPA received comments from Michael J. McMasters, Idaho Division of Environmental Quality (IDEQ). No other comments were received. The following summarizes the comments and EPA's response.

**Comment.** Effluent Monitoring Requirements. The commentor stated that the fecal/E.coli monitoring should be changed from five times per week to five times per month. This proposed change is consistent with the requirements in the permits recently issued to the smaller communities along the Mid Snake River pursuant to Idaho Water Quality Standards & Wastewater Treatment Requirements IDAPA 16.01.02.250.01(a)(b).

**Response.** EPA agrees with this comment and will change the final permit accordingly.

**Comment.** Ambient Monitoring Requirements. The commentor stated that the ambient water quality monitoring requirements should be changed from monthly to quarterly. This proposed change would provide adequate and representative ambient monitoring information to assist in the development of the total maximum daily load (TMDL) for the applicable Big Wood River segment.

**Response.** EPA agrees with this comment and will change the final permit accordingly.

**Comment.** Effluent Limitations - Total Nitrogen as N and Total Phosphorus as P. The commentor stated some concerns about the proposed total nitrogen and phosphorus limits since these limits were based on the IDEQ staff evaluation conducted in 1980. The commentor proposed a compliance schedule be developed for total nitrogen and total phosphorus in which the permittee would conduct two years of monitoring (effluent and ambient) and also include an additional period of one year in which IDEQ/EPA would evaluate the information to determine consistency with the development of the TMDL. At the end of the three year compliance schedule, the permit would be modified to incorporate the loadings specified in the TMDL for the Meadows wastewater treatment plant.

**Response.** EPA agrees with the comment and will change the permit to not include effluent limitations for total nitrogen and total phosphorus. The permit will be modified to require two years of effluent monitoring for the following parameters: Total Kjeldahl Nitrogen, Total Ammonia as N, Nitrate as N, Nitrite as N and Total Phosphorus as P. The draft permit required ambient

monitoring by the permittee for a period of two years, therefore this condition will not be changed.

As specified in Permit Condition IV.Q. (Reopener Provision), permits may only be modified, revoked, reissued or terminated for the reasons specified in 40 CFR Parts 122.62, 122.63, 122.64 and 124.5. This includes new information which was not available at the time of permit issuance and would have justified the application of different permit conditions at the time of issuance. When the Big Wood River TMDL is developed and approved, EPA will determine whether to include applicable wasteload allocations specified in the TMDL by modifying the current permit or reissuing the expired permit.

**Comment.** Antidegradation Analysis. The commentor stated that IDEQ has conducted an analysis of degradation utilizing an oxygen sag model for biochemical oxygen demand (BOD) and has found no oxygen sag in the receiving water for both the old and new proposed effluent limits. In addition, a mass balance analysis was conducted for total phosphorus and total suspended solids on the Big Wood River at low flow conditions. The mass balance analysis has shown that the increase in total phosphorus and total suspended solids is below statistically detectable levels. IDEQ has concluded that the proposed effluent limits would cause no degradation of beneficial uses in the Big Wood River and the permit can be issued without further antidegradation analysis.

**Response.** In the State Certification section of the fact sheet for the draft NPDES permit (pg. 1), EPA requested that the Idaho Division of Environmental Quality (IDEQ) conduct an antidegradation analysis in accordance with the state antidegradation policy (IDAPA 16.01.02.051) and certify the NPDES permit for The Meadows, under section 401 of the Clean Water Act. Per EPA's request, IDEQ has included this comment in the 401 certification.